

Hal Taylor, Esq.
 Of Counsel, Olinsky Law Group
 NV Bar No.: 4399
 2551 West Lakeridge Shores
 Reno, NV 89519
 Tel: (775) 825-2223
 Fax: (775) 329-1113
 Email: HalTaylorLawyer@gbis.com
 Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

JULIE LYNN FRY,)	
)	
Plaintiff,)	CASE NO.
)	2:23-cv-00891-RFB-VCF
v.)	ORDER GRANTING
)	SECOND UNOPPOSED MOTION
)	FOR EXTENSION OF TIME TO FILE
KILOLO KIJAKAZI, ACTING)	PLAINTIFF'S BRIEF
COMMISSIONER OF SOCIAL SECURITY,)	
)	
Defendant.)	
_____)	

Plaintiff, Julie Lynn Fry, by her attorney, moves for a forty-five (45) day extension of time to file Plaintiff's opening brief. Plaintiff's opening brief is currently due to be filed December 15, 2023. This is Plaintiff's second request for an extension of time in this matter. On October 12, 2023, this Court granted Plaintiff's first Motion for an Extension of Time (Dkt. No. 15).

Counsel requests this extension due to the assigned briefing attorney going out on a prolonged medical leave and will not be returning to the office until after the New Year. This leave has necessitated a complete reorganization and rescheduling of pending matters on that attorney's schedule. Further, Counsel has explored reassigning this matter to a different briefing attorney in Counsel's office prior to the briefing deadline, but is unable to do so due to multiple, simultaneous filing deadlines. Counsel requires additional time to properly and thoroughly


1 prepare Plaintiff's brief. For instance, between November 24, and January 26, 2023, staff in
 2 Counsel's office have one hundred and forty-five (145) Plaintiff briefs due. This figure does not
 3 include oral arguments, appeals to Circuit Courts, Reply Briefs, settlement negotiations, and the
 4 various other tasks which arise throughout the course of litigation. These circumstances do not
 5 allow for Plaintiff's Counsel to properly prepare the brief by the current deadline. This request
 6 will not cause Defendant any undue hardship. This extension is needed to thoroughly and
 7 properly prepare the brief.
 8

9 Wherefore, Plaintiff requests an extension from December 15, 2023, up to and including
 10 January 29, 2024, to file her brief. Counsel for the Plaintiff has conferred with Defendant's
 11 Counsel who kindly has no objection to this request.
 12

13 Dated: December 7, 2023.

14 IT IS SO ORDERED.

Respectfully submitted,

15 
 16 CAM FERENBACH,
 17 US MAGISTRATE JUDGE

/s/Hal Taylor
 Hal Taylor, Esq.

18 DATED: December 22, 2023 **Plaintiff's Certificate of Service:**

19 I certify that I caused the Second Unopposed Motion for Extension of Time to be served
 20 today, December 7, 2023, by CMECF to Blaine T. Welsh, Esq., and Franco Becia, Esq., who are
 21 filing users of the CM/ECF system.
 22

23 /s/Hal Taylor
 24 Hal Taylor
 25
 26
 27
 28